

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNILOC 2017 LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA, INC.
and SAMSUNG ELECTRONICS CO. LTD.

Defendants.

Civil Action No. 2:18-cv-508-JRG

**DECLARATION OF ALLAN A. KASSENOFF
IN SUPPORT OF SAMSUNG'S *DAUBERT* MOTION TO EXCLUDE
CERTAIN OPINIONS AND TESTIMONY OF WILLIAM "CHUCK" EASTTOM II**

I, Allan A. Kassenoff, hereby declare as follows:

1. I am an attorney at law duly licensed to practice law in the State of New York, admitted to the United States District Court for the Eastern District of Texas, and am a shareholder of the law firm of Greenberg Traurig, LLP, attorneys of record for Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd. (collectively, "Samsung") in the above entitled action, and make this declaration in support of Samsung's *Daubert* Motion to Exclude Certain Opinions and Testimony of William "Chuck" Easttom II. Unless otherwise stated, I have personal knowledge of the facts set forth in this declaration, and if called as a witness, could and would competently testify as set forth below.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the Expert Report of Dr. William C. Easttom II (Chuck Easttom) Regarding Infringement of U.S. Patent No. 6,836,654, dated February 18, 2020.

3. Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No. 6,836,654 entitled, "Anti-Theft Protection for a Radiotelephony Device."

4. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiff's Disclosure of Asserted Claims and Infringement Contentions, and Exhibit A thereto, dated March 14, 2019.

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the Expert Report on Non-Infringement by Nenad Medvidovic, Ph.D., dated March 9, 2020.

6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the deposition transcript of Dr. Chuck Easttom, dated April 1-2, 2020.

7. Attached hereto as Exhibit 6 is a true and correct copy of an excerpt from the transcript of the Pretrial Hearing from *Uniloc USA v. Samsung Elec. Am., Inc.*, No. 2:17-cv-651-JRG, Dkt. 170 (E.D. Tex. Mar. 4, 2019).

8. Attached hereto as Exhibit 7 is a true and correct copy of the Order Memorializing Rulings from March 4, 2019 Pretrial Hearing from *Uniloc USA v. Samsung Elec. Am., Inc.*, No. 2:17-cv-651-JRG, Dkt. 173 (E.D. Tex. Mar. 8, 2019).

I declare under penalty of perjury that the foregoing is true and correct.

DATED: April 24, 2020

/s/ Allan A. Kassenoff
Allan A. Kassenoff